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**MEMO**

To:  
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United States Environmental Protection  
Agency

Copies:  
John Persico

From:  
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Date:  
July 8, 2015

ARCADIS Project No.:  
B0033203.0004

Subject:  
Summary of Conference Call with USEPA, NJDEP, and Rolling Knolls Settling Parties,  
June 30, 2015  
Rolling Knolls Landfill Superfund Site, Chatham, New Jersey

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This memorandum is a summary of the conference call on June 30, 2015 to discuss USEPA's comments (dated June 17, 2015) on Addendum 1 of the Data Gaps Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) for the Rolling Knolls Landfill Superfund Site in Chatham, New Jersey. The call was attended by:

- Tanya Mitchell, United States Environmental Protection Agency (USEPA);
- Michael Sivak, USEPA;
- Michael Clemetson, USEPA;
- Katie Mishkin, USEPA;
- Juan Fajardo, USEPA;
- Jill McKenzie, NJDEP;
- Steve Burns, NJDEP;
- Dave Van Eck, NJDEP;
- Ricky Chenenko, CDM;
- Richard Ricci, Lowenstein Sandler LLP;
- Mickey Faigen, Issues Management, LLC;
- Michael Draikiwicz, Novartis;
- Linda Bergsten, Novartis;

- Andrew Gutherz, ARCADIS;
- John Persico, ARCADIS;
- Suzy Walls, ARCADIS;
- John Samuelian, Integral; and
- Judi Durda, Integral.

During the call, John Persico (ARCADIS) lead the discussion of general and specific comments from the USEPA's comment letter as summarized below. Note that some of the comments in the June 30, 2015 letter were not addressed during the call.

**General Comment 1:** ARCADIS asked for clarification of how and where data at the site were “highly variable” as USEPA stated in their comment and whether this determination was a quantitative or qualitative assessment. USEPA responded that there was variability in the contaminants identified throughout the site and as a result, USEPA was requesting full TCL/TAL on all samples. ARCADIS asked if a variability analysis of the data was conducted, whether USEPA would consider reducing the full parameter list if variability was not indicated. USEPA responded that it would consider foregoing analysis of VOCs but other constituent groups (e.g. pesticides, PCBs) should continue to be analyzed in upcoming Data Gaps sampling. USEPA asked for the anticipated timeframe of this analysis and ARCADIS responded that they would need to consult with the Group prior to committing to the analysis or schedule.

**General Comment 2:** ARCADIS asked for clarification on the request for sample depths and elevations, given that ARCADIS is already providing sample depths for all samples and elevations have not been included on any of the previous work. NJDEP responded that the comment was in relation to the perimeter samples and mode of transport of contaminant to areas outside of the landfill boundary. USEPA asked if this information was available using a GPS device and ARCADIS responded that it was not because a GPS unit does not provide elevation data of adequate accuracy, so elevations would require a surveyor to visit each location. ARCADIS stated that the site is relatively flat and that we were already targeting low areas for delineation purposes, and further stated that the site base map had accurate topographic contour lines that would help indicate sample elevations. NJDEP responded that the figure provided with proposed sample locations was difficult to interpret. ARCADIS suggested a site visit with NJDEP to each of the 33 NJDEP proposed locations. NJDEP declined a site visit and indicated that some of its sample locations were intended to assess low areas, some were grid based and some were based on existing sampling results. The Group requested that NJDEP provide its rationale for each of the suggested samples, as this would be helpful in making any necessary field adjustments. NJDEP agreed to provide a table that would list the 33 additional sample locations and its rationale for each.

**Specific Comment 1:** ARCADIS asked for clarification on the sentence USEPA requested to be removed from the document. USEPA responded that the sentence implies we are not looking at the original document. ARCADIS noted that it was not the intent to ignore the original document and could revise the

sentence in question. USEPA instead suggested that the paragraph be revised to remove the sentence. ARCADIS agreed to revise accordingly.

**Specific Comment 2:** ARCADIS requested clarification on the objectives section of Addendum 1, as it was the Group's understanding that both USEPA and NJDEP had already weighed in on any additional data gaps samples and provided feedback in an email from Ms. Tanya Mitchell of USEPA to Ms. Suzanne Walls of ARCADIS on April 6, 2015, in which email Ms. Mitchell requested 7 additional soil samples. The Group further questioned why 33 additional samples had been added to the list of identified data gaps, given that no new information was available now that was not available on April 6, 2015. USEPA responded that NJDEP had a new project team that identified additional data needs. NJDEP added that the previous project team from NJDEP had provided generic comments to USEPA but to comply with the New Jersey delineation requirements, the current team was providing more specific comments. USEPA added that while it did evaluate the NJDEP comments, it would endorse those comments that were required by NJDEP regulations, as the USEPA will ultimately need concurrence with the state on characterization of the site and remedy selection. USEPA indicated that it would be willing to compromise on the number of additional samples required for the upcoming round of data gap sampling.

**Specific Comment 3:** ARCADIS asked for clarification on the delineation requirements requested by NJDEP, specifically referring to the use of NJ Ecological Screening Levels (ESLs). NJDEP stated that it requires delineation to the lower effect limits (LELs). ARCADIS responded that this delineation was not necessary for the BERA and asked USEPA what was needed for site delineation. USEPA responded that only Human Health-Based Soil Remediation Standards (SRS) (residential and non-residential) were NJDEP regulatory requirements that should be used for delineation, and that other criterion, such as the NJ ESLs and NJ Impact to Groundwater Standards (IGWs) were not delineation requirements but rather guidance.

**Specific Comment 4:** ARCADIS asked for clarification on the request for a topographic evaluation, given that the site is relatively level. They also stated that if significant topographic variations existed, we would consider them. USEPA requested additional discussion on how this information would be considered for the newly proposed samples. The Group responded that since NJDEP and USEPA had selected the location for the additional samples, the justifications should be provided by the agencies. USEPA stated that locations had not yet been agreed upon and that topography should be considered in ongoing efforts to finalize the sampling locations.

**Specific Comments 5 and 6:** USEPA requested that NJDEP lead the discussion for specific comments 5 and 6. NJDEP said that they evaluated the total number of samples collected on the site and determined that there were insufficient data collected. They placed a grid across the site and located samples approximately 800 feet apart. They also stated that only horizontal delineation samples were proposed and that vertical delineation samples were also necessary along the perimeter of the landfill. ARCADIS asked if NJDEP was requesting two samples be collected at each surface soil interval (0 to 1 foot below

ground surface). NJDEP responded that the original intent was to collect a full TCL/TAL sample from 0 to 6 inches (except VOCs), and to collect a second sample of full TCL/TAL from 6 inches to 12 inches. However, after further review, NJDEP determined that one surface soil interval (0 to 1 foot) was sufficient, provided that the VOCs were collected from the deeper half of the sample (6 to 12 inches below ground surface). ARCADIS responded that it appears NJDEP is designing a remedial investigation on top of the one we have already prepared with USEPA. NJDEP stated that they understood the Group's frustration but that NJDEP now had a full case team on the project and would be providing specific comments and suggestions necessary to fulfill the NJDEP requirements. The Group asked if NJDEP intended to revisit other locations within the landfill. NJDEP responded that vertical delineation within the footprint of the landfill would not be required for all previous locations. NJDEP also stated that they were interested in vertical delineation from beneath the waste material or on top of the clay layer. Furthermore, NJDEP requested that all of their criteria be considered and discussed in the nature and extent of the remedial investigation. ARCADIS explained that it was risky to determine sampling locations merely by placing dots on a map, because access to many areas of the site is extremely difficult due to the dense vegetation at the site. The Group emphasized that they wanted the USEPA and the NJDEP to be in agreement on the number and location of the upcoming samples before actually taking those samples in order to minimize the risk that yet another round of sampling would be required after this one. To that end, the Group invited the NJDEP personnel to visit the site with ARCADIS to field-locate the proposed sampling locations. The NJDEP personnel declined that invitation.

ARCADIS again emphasized the utility of the NJDEP providing its rationale for each of the 33 locations identified for additional sampling. ARCADIS also asked why samples were requested in surface water bodies north of the site. NJDEP responded that it appeared as though the identified surface water bodies had not been sampled but, given the unpredictable contamination across the site, these water bodies could be collecting runoff from the site. NJDEP noted that the suggested locations could be modified based on field observations to target low lying areas. NJDEP also stated that the number of proposed samples was already a compromise from what would typically be required on a site of this size.

**Specific Comment 7:** The Group asked if ARCADIS could prepare a revised proposal of sample locations based on the rationale table from NJDEP and a site visit to assess each of the proposed locations. USEPA agreed with this proposal and added that as long as the revised sampling plan met the intent of the state, there would be some flexibility in the number of locations. NJDEP agreed with this approach.

NJDEP did not commit to a date for providing the rationale table for the currently proposed 33 sampling locations. ARCADIS stated that upon receipt of the table, it would go to the site and attempt to field-locate each sample location. Again, ARCADIS suggested NJDEP participate in the site visit but NJDEP declined. ARCADIS also agreed that within two weeks of receipt of the NJDEP table it would provide a revised figure and summary table of sampling locations. Once sample locations were agreed upon

between the Group and the agencies, Addendum 1 of the Data Gaps SAP and QAPP would be revised and submitted to USEPA and NJDEP for final approval.